



4600 West 60th Avenue Arvada, Colorado 80003 T 303.433.9788 / F 303.433.1432

December 11, 2018

Ms. Alexis North
Office of Enforcement, Compliance & Environmental Justice
EPA Region 8
1595 Wynkoop Street (8ENF-AT)
Denver, CO 80202-1129

RE: NSPS Subpart OOOOa Initial Report

Cub Creek Energy

RECEIVED

DEC 17 2018

Office of Enforcement, Compliance and Environmental Justice

Dear Ms. North,

LT Environmental, Inc. (LTE) is submitting on behalf of Cub Creek Energy the attached initial report for NSPS Subpart OOOOa for the September 13, 2017 through September 1, 2018 reporting period. This package includes the appropriate portions of the EPA provided reporting template, as well as a signed certification of completeness by a responsible official.

Please feel free to contact me at 303-704-1066 or cdimarco@ltenv.com if you have questions.

Sincerely,

LT ENVIRONMENTAL, INC.



Chris DiMarco
Project Air Quality Scientist

cc: Tracy Butzen - Cub Creek Energy



Name: (Last) Baily (First) Scott	(MI) <u>B</u>
Title President	
Street or P.O. Box 200 Plaza Dr. #100	
City Highlands Ranch State CO ZIP 80129	
Telephone (303) 446 - 6140 Ext Facsimile () _	
Certification of Truth, Accuracy and Completeness (to be signed by official)	the responsible
I certify under penalty of law, based on information and belief formed af inquiry, the statements and information contained in these documents a complete. (b) (6)	
Name (signed)	
Name (typed) Scott B. Baily Date: 12	17/18

Responsible Official

80 CTR Part 60 - Nandards of Performance for Crude CB and Natural Cas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.1420a(b) Annual Report For each affacted facility, an owner or operator must include the internation specified in paragraphs (b)(1)(i) through (iv) of this section in all annual reports:

				SITE INFORMATION					_	_	ALTERNATIVE ADDRESS INFOR	MATION (IF NO PHYSICAL ADDRE	SE ATRIANSSE POR BIG 1	AND OR LEGIS	PERMATION	PE Cartification		AL INFORMATION
olity Nacord No. * Plofd value will subsensibly exercise if a value a topi antiaved.)	Company Name * (966.5420a(b)(1/0))	Facility Site Manu.* (940 542046)(230)	US Well ID or US Well ID Associated with the Affectable * Applicable * 1960.54-22a/36/3090	Address of Affected Funds 4 (660 5425ub)(176))	Address 2	Oly 1	County *	Stone Abbreviation*	Ze Cade *	Assumption Agency facility ID (State Facility Interestive)	Description of life Location (966.5420e(lgCI)(3)	Latitude of the Site (declaral dispress to 5 declarate using the Booth American Datum of 1983) (968-5426-09(120)	Longitude of the Site (declared degrees to 5 declared using the Horth American Curtum of 1983) 1980-5420-81336	Regioning Date of Reporting Period.* (960.5410ath/11/040)	Sinding Outs of Reporting Period * (\$603.542/66/05(1869)	Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a central device or provides [905.58406][12] Please provide only one file per recent.	Please enter only additional edocration.	Serer proditions rame referen
	A RECEIPTED			e.g.: 125 Main Street	Art Core 150	na - Brooker	n.e. Times Count	VA.2. W	eg Hilli		e.e. 7 miles fell of the			*4 00/01/2019		e.g.: Certification yell ar		ng-palled-upw
	ag . or market	e a Linkson	*# 12-M5-6785-12						-		anarsection of Hay 175 and	FR: 9412585	64: (01.12345			#1/Compressorization.pdf		EAST made a minutes
		MAN	A STATE OF THE PARTY OF THE PAR								Hwy 456	(h) (0)						por
	Cub-Creek Energy	Haley Padi	29-123-43131	NWSW Sec. 20 TWN 86	BW .	Longmont	Strekt	CO	80504	123/9/96	6 miles NE of Langement off State	(b) (9)		9/13/2017	9/32/2018			
	Cuts Creek Energy	Haley Pat.	05-123-43130	NWSW Sec. 20 T3N R6	ew.	Longmont	Morelei	CO	80504	123/9896	6 miles Nt of Langesons off State			9/13/2017				
1	Cuto Creek Energy	Haley Pati	05-173-43133	NWSW Sec. 20 TSN 66	aw.	Langmost	Wreter	CO.	80504	123/9896	6 miles NE of Langmore off State			9/18/2017	0/12/2018			
Y.	Cult Creek Energy	Haley Pati	05-129-49118	NWSW Sec. 20 TEN RI	BW/	Longmant	Weld	COL	60504	173/9896	6 miles fell of Longmont off State			9/19/2017	9/32/2018			
1	Cult Creek Energy	Haley Pad	05-123-43129	NW5W Sec. 20 TSN 86	RW.	Longmont	Weld	CD		123/9/96	6 miles NI of Longmort off State			9/13/2017	9/32/2018			
3	Cub Creek Energy	Haley Fatt	09-123-43128	NWSW Sec. 20 TEN RE	WE WE	Longmont	Weld	.02	82504		6 miles NE of Longmort off State			9/13/2017	9/12/2016			
	Cub Creek Energy	Haley Pati	05-123-45134	NW5W Sec. 20 TSN R6	BW/	Longmont	Weld	CO	80504		6 miles NF of Largewort off State			9/13/2017	9/12/2018			
	Cub Creek Energy	Utpenberger Pad	05-133-42784	SENE Sec. B TIN RGBW		Mead	weir	CO	80542	123/9876	2 miles NW of Mead off Weld CI			4/24/2018	9/33/1018			
2	Cub Creek Energy	Litzenberger Pad	05-129-42762	SENE Sec. 8 T3N RGBW		Mead	Weld	CO	80542	123/9FF	2 miles NW of Mead off Weld Cl			4/34/3018				
2	Cub Crack Energy	Utpenherper Pad	05-129-42778	SENE Sec. & TIN REBY		Mead	West	00	90542	123/9894	I miles NW of Mead off Weld CR			4/24/2018	9/12/2018			
2	Cub Creek Energy	Utsenberger Fad	05-129-43780	SENE Sec. II TIN RGIN		Mead	Weld	COL	80542	123/9FF6	2 miles NW of Mead off Weld CI			4/24/2018	9/12/2018			
2	Cub Creek Energy	Utperdenger Pad	05-129-43779	SENE Sec. & TSN R6676		Mead	Weln	60		123/9FF6	2 miles NW of Missel off Weld Ch			4/24/2018	9/32/1034			
2	Cub Creek Energy	Utrentierger Pad	05-129-42770	MINIT Sec. B TIN RAW		Mead	Well	60		123/9476	2 miles NW of Mead off Weld CI			4/24/2018				
2	Culo Creek Energy	Utperdierger Pad	09-129-42781	SENE Sec. 8 TSN RGBN		Mead	Wartel	CID		123/9676	2 miles NW of Mines off West Cf			4/24/2018	9/12/2018			
2	Cuts Cresk Energy	Utperstnerger Field	75-123-42771	SAME SEC. B TON RESTW		Mead	Webi	CO		123/9819	2 miles NW of Missel off Weld Ch			4/2A/201A				
2	Cub Creek Frengy	Ukareherger Fed		SENE Sec. 8 TIN BERN		Mead	Wark)	CD		123/9616	2 miles NW of Minad off Weld Cf			4/24/2018 4/24/2018				
2	Cub-Creek Energy	Utpenberger Fad		SENE Sec & TSN RSBW		Mead	White	CD		123/9976	2 miles NW of Mead off Weld Co			4/24/201A 4/24/201B				
2	Cub Creek Energy	Utpenberger Pad		SENE Sec. 8 TIN AGEN		Meat	Weld	(3)		123/9876	2 miles NW of Mead aff Weld Cl			4/24/2018				
- 2	Cub Creek Energy	Litzenberger Fait		tent tec 8 Tin 6689		Mead	West	CD		123/9676	2 miles NW of Mixed off Weld Cl			4/24/2018				
1	Cub Creek Energy	Utperdunger Fluid		SENE Sec. & Tan REEN		Mest	WHE.	00		123/9819	2 miles NW of Mase off Weld Cl			4/34/2018 4/34/2018				
	Cub Creek Energy	Uttertherger Fiel	05-129-42776	SENT Sec. # 75% RGBN		Mead	Welst	-033		121/9875	2 miles NW of Mead off Weld Cl			4/24/2018				
	Cub Creek Energy	Litzenberger find	05-123-42769	SENS SEC & TIN SERVI		Mead	www.	1.00		123/9896	2 miles NW of Mead off Weld Cl			4/24/2018				
2	Gilb Creek Energy	Litzenberger Fod	05-123-47777	MAR Sec. 8 TIN RIGHT		Mead	WHITE.	ED	90542	123/9616	Z review NW of Minut off World Cl			4747018	W 837 200 4			

DIT For RE: Statistics of Performance for South Street Name No. South Street South Construction, Multilabels or Reconstruction Construction September 18, 2015 SECTION SOUTH SECTION SOUTH SECTION SOUTH SECTION SECTION S

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40 CFR Part 60 - Standards of Performance for Crude Dil and Natural Gas Facilities for which Construction, Modification or Reconstruction of Resonance After September 18, 2015 - 60.5420/(b) Annual Report

For the collection of flagilities emissions components at each well sits and the collection of fugitive emissions components at each compressor station within the company-defined area, an owner or operator must include the records of each monitoring survey including the information specified in paragraphs (b)(7)(0) through (oil) of this section in all annual reports:

The asterisk ("I nest to each field indicates that the corresponding field is required.

Select from (Select from dropdown list - may need to stroll up.)	identification of Each Affected Fucility * (560.5420a(b)(1))	Date of Survey * (\$60.5420a(t)(7)(9)		Survey End Time * (\$60.54204(b)(7)(ii))	Name of Surveyor * (940.5420a(b)(7)(iii)	Ambient Temperature During Survey * (860:5420u(b)(7)(iv))	Sey Cleratitions During Survey * (660:5420a(b)(7)(iv))	Maximum Wind Speed During Survey (\$60.5420a(b)(7)(iv))	Monitoring instrument Used * (660.5420a(b)(7)(v))	Deviations From Monitoring Plan (If none, state none.) * (660.542(u(h)(7)(vi))	Type of Component for which Fugitive Emissions Desected * (860,54204(b)(7)(46))	Number of Each Component Type for which supplie Emissions Detected * (\$40.5420a(b)(7)(w)))	Type of Component Not Repaired as Required in 960.5997a(h) * (560.5420a(b)(7)(viii))	Number of Each Componer Type Not Repaired as Required in 9 80 5397a(h) (960 5470a(b)(7)(viii)
	e.g.: Well Ske ABC	# 6 : N/15/17	e.g.: 10:00 am	e.g.: 1:00 pm		e.g: 90°F	e.g.: Sunny, no clouds		e.g. Company AHC optical gas imaging camera	e.g.: None	e.g.: Valve	161	e.g. Value	* pri
1	L Haley Pad	1/10/201	8 2:49 PM	3.28 FM	(h) (6)	4	Cloudy	5 mph .	FLIR OGI Carvera	None	Valve		N/A	N/A
1	Haley Pad	1/10/201	8 2.49 PM	3:28 PM	(D)(C)	4	Coudy	5 mpb	FLIR OCI Camera	None.	Connector	1	N/A	N/A
	Halay Pad	2/10/201	8 2:49 PM	1:28 PM			Caudy	5 mph	FLIR OKI Camera	None	Thief Hatch		N/A	N/A
1	Haley Pud	6/15/201	8 1:05 PM	2:02 PM		81	Coudy	6 mph	FLIR Oldi Camera	None	Thief Hatch	2	N/A	N/A
2	Littenberger Pad	8/8/201	8 1:00 PM	1:46 PM			Partly Cloudy	5 mph	FLIR OGI Camera	None	Connector	5	N/A	N/A
	Litzenberger Pad	8/8/201	8 1:00 PM	1:46 PM		7	Partly Cloudy	5 mph	FLM OCI Camera	None	PRV		N/A	N/A
1	Litzenberger Pad	8/8/201	8 1:00 PM	1:46 PM		7	Partly Cloudy	5 mph	FLIR O'GI Camera	None	Thief Hatch	4	N/A	N/A

									ŌGI	Compressor St	ation Affected Facility Only
Type of Difficult-to- Monitor Components Monitored * (\$60.5420a(b)(7)(b))	Number of Each Difficult- to-Monitor Component Type Monitored * (660.5420a(b)(7)(int)	Type of Uniafe to- Monitor Component Monitured * [§60.5420s(b)(7)(k)]	Number of Each Unsale- to-Moniter Component Type Munitored * {\$60.5420s(b)(7)(x)}	Date of Successful Repair of Fagitive Emissions Component * (560,5420a(b)(7)(x))	Type of Component Placed on Delay of Repair * (460,5420s(b)(7)(xi))	Mumber of Each Component Type Placed on Delay of Repair * (\$60.5420s(b)(7)(xii))	Explanation for Delay of Repair * (§60.5420a(b)(7)(xi))		Training and Experience of Surveyor * (\$60.5420e(b)(7)(ii))	Was a monitoring survey waived under § 60.5397a(g)(5)? * (§60.5420a(b)(7))	If a monitoring survey was welved, calendar months that make up th quarterly monitoring period for whit the monitoring survey was waived. (\$60.54204(b)(7))
g.; Valve	egit	e.g. Valve	east.	ee:11/10/16	e.g.:Valve	eg:1	e.g. Unsafe to repair until next shutdown	e.g.: Company ABC optical gas imaging camera	e.g. Trained thermigrapher, completed 40-hour course at XYZ Training Center. Has 10-years of experience with OGI surveys.	e.g.: Yes	e.g.: January; February; and March
MA.	N/A	N/A	N/A	1/30/201	E N/A	N/A	N/A	FLIR OGI Camera	2+ years of leak detection and repair field experience	No	R/A
i/A	N/A	N/A	N/A	1/10/201	E N/A	N/A	N/A	FUR OGI Camera	2+ years of leak detection and repair field experience	No	N/A
t/A	N/A	N/A	N/A	1/10/201	E R/A	N/A	N/A	FLIR OGI Camera	24 years of leak detection and repair field experience	No	N/A
I/A	N/A	N/A	N/A	6/15/201	8 N/A	N/A	N/A	FUR OGI Camera	2+ years of leak detection and repair field experience	No	N/A
i/A	N/A	N/A	N/A	8/10/201	8 N/A	N/A	N/A	FUR OG! Camera	2+ years of leak detection and repair field experience	No	N/A
VA	N/A	N/A.	N/A	8/10/201	8 N/A	N/A	N/A	FLIR OG! Camera	2+ years of leak detection and repair field experience	No	N/A
I/A	N/A	N/A	N/A	8/10/201	5 8176.	N/A	N/A	FLIR OGI Camera	2+ years of leak detection and repair field experience	No	N/A